

REMARKS

The last Office Action in the above-identified application and the references cited by the Examiner have been carefully considered. The claims have been amended in a sincere effort to define more clearly and more specifically features of Applicants' invention which distinguish over the art of record.

Independent method Claims 1 and 18 and independent apparatus Claims 12 and 20, and dependent Claims 2-11, 13-17, 19, 22 and 23 have been rejected under 35 U.S.C. §102(e) as being anticipated U.S. Patent No. 6,216,230 (Rallis, et al.).

With respect to method Claim 1 and apparatus Claim 12, the Examiner contends that the Rallis, et al. patent discloses a method of securing a token from unauthorized use, which includes the steps of receiving a first message transmitted from a host processing device and addressed to a PIN entry device according to a universal serial bus (USB) protocol, and refers to column 1, lines 49-54 for the Rallis, et al. patent for showing this; the step of accepting a PIN entered into the PIN entry device, and refers to Figure 1A, the first sheet thereof, and column 1, lines 49-52 of the Rallis, et al. patent for disclosing this; and transmitting a second message including at least a portion of the first message and the PIN from the PIN entry device to the token along a secure communication path, and refers to column 1, lines 54-59 of the Rallis, et al. patent for disclosing this feature.

With respect to independent method claim 18, the Examiner contends that the Rallis, et al. patent discloses all of the steps mentioned previously with respect to Claim 1, but also the step of receiving the first message transmitted from a host processing device and addressed to a PIN entry device, at column 1, lines 51-59 of the Rallis, et al. patent; a USB port communicatively coupled to a host processing device via a first communication path, in Figure 1A and at column 1, lines 49-59 of the Rallis, et al. patent; transmitting the first message to the PIN entry device coupled to the USB compliant hub, as the Rallis, et al. patent discloses a USB port and the step of the transmitting the second message comprising a portion of the first message and the PIN, and at least a portion of the first message from the PIN entry device to the token along a secure communication path and transmitting a second message from the PIN entry device via the USB hub, at column 1, and column 2, lines 35-43;

transmitting a third message comprising the PIN from the PIN entry device to the USB-compliant hub, processing the message in the USB-compliant hub to produce the second message, and transmitting the second message from the USB-compliant hub, at column 1, lines 44-67 of the Rallis, et al. patent.

With respect to independent apparatus Claim 20, the Examiner contends that the claimed features are disclosed in the Rallis, et al. patent for basically the same reasons she stated with respect to Claims 1 and 18.

Similarly, and as mentioned previously, the dependent claims have also been rejected in review of the Rallis, et al. patent, and their rejection is set forth on Pages 2-6 of the Office Action.

The comments of the Examiner concerning the rejection of the claims in view of the Rallis, et al. patent have been carefully considered and are appreciated. In view of the Examiner's comments, independent method Claims 1 and 18, and independent apparatus Claims 12 and 20 have been amended in a sincere effort to define more clearly and more specifically features of Applicants' invention which distinguish over the art of record. More specifically, each of independent Claims 1, 12, 18 and 20 have been amended to more clearly recite that the PIN entry device which communicates with the host processing device is different from a keyboard associated with the host processing device. This appeared to be one of the concerns of the Examiner, and Applicants wish to point out that the PIN entry device is entirely different from a keyboard associated with the host processing device. This is clearly shown in Figure 7 of the drawings, where the PIN entry device 272 is separate and entirely different from a keyboard which would be associated with the host computer 102, such as keyboard 114 shown in Figure 1. Please also see Figure 1 of the drawings, where it is clearly shown that keyboard 114 is separate and distinct from PIN entry device 272, which communicates with the host computer separately from keyboard 114 through I/O port 130, which is a USB-compliant port.

The Rallis, et al. patent does not teach or suggest the use of a separate and distinct PIN entry device. In fact, in the Rallis, et al. patent, the user inputs the PIN using his laptop computer and the regular keyboard associated with the computer.

Accordingly, independent Claims 1, 12, 18 and 20, as now more specifically amended to include this limitation, are respectfully urged to patentably distinguish over the references of record, including the Rallis, et al. patent and are respectfully submitted to be allowable. Dependent Claims 2-11, 13-17, 19, 22 and 23 are also respectfully urged to be allowable because of their dependency on amended independent Claims 1, 12, 18 or 20.

It is also respectfully urged that the claimed invention patentably distinguishes over the Rallis, et al. patent for other reasons. In the Rallis, et al. patent, the PIN is not sent to the token, which is contrary to the teachings of the invention defined by Claims 1, 12, 18 and 20 and the dependent claims mentioned previously. The passages in the Rallis, et al. patent cited by the Examiner for showing the PIN being transmitted to the token are believed to be Column 1, lines 51-54, Column 1, lines 60-67 and Column 2, lines 52-56. However, from Applicants' reading of these passages, and a careful analysis of the entire Rallis, et al. patent, it is respectfully urged that nowhere in the Rallis, et al. patent is it stated that the PIN is sent to the token. This is also confirmed based on the flow chart shown in Figure 3A of the Rallis, et al. patent. The PIN is entered into the host computer many steps down in the process and is stored on the computer's hard disk in the stored validation record. The encryption key may be used to decrypt the hard drive serial number and PIN, as stated at Column 1, lines 54-59 of the Rallis, et al. patent, but the PIN is never sent to the key device, as verified by the flow chart shown in Figure 3A of the Rallis, et al. patent. All communications with the token occur before the PIN is entered by the user to the computer, in the Rallis, et al. patent. The PIN is never sent to the key device in the Rallis, et al. patent.

The Rallis, et al. patent states that the encrypted PIN value is stored in the validation record on the hard disk of the computer. The value in the validation record gets decrypted, as shown in Figure 3A and disclosed at Column 1, lines 58-59, and the manually-entered PIN is matched to the decrypted PIN, as stated at Column 3, lines 17-19 of the Rallis, et al. patent.

The "super key" disclosed in the Rallis, et al. patent, at Column 4, lines 31-39, cannot be the user entered PIN, as according to the Rallis, et al. patent, "a 'super key' verification step may be inserted at the start of the user validation procedure. The access code procedure requires the key device 20 to verify receipt of a matching code number before it will output the serial number and encryption key data." (Rallis, et al. patent, Column 4, lines 31-39.)

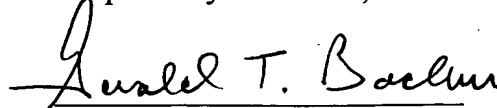
This means that all of this occurs well before the user enters the PIN in step 5 of the flow chart shown in Figure 3A of the Rallis, et al. patent.

Accordingly, it is respectfully urged that independent Claims 1, 12, 18, 20, as now amended, and the claims which depend therefrom, patentably distinguish over the Rallis, et al. patent and the other references of record for the reasons submitted above.

Independent method Claim 18 and independent apparatus Claim 20 have also been amended so that it is clear that the hub is what intercepts the message sent to the token and redirects it to the PIN entry device. The claim has also been amended to clarify that the hub itself accepts the PIN and it, itself, generates another message which is sent to the token having the user-entered PIN. A standard USB hub never "intercepts" a message and redirects it to a different USB device to which the message was originally addressed. Conventional USB hubs either act as pass-through devices between a host computer and another device, or generate a message to the host computer only. The USB hub defined by Claims 18 and 20 is a non-standard hub and functions entirely different from any conventional hub. Accordingly, it is respectfully urged that Claims 18 and 20, as now more specifically amended, patentably distinguish over the references of record and are allowable for the reasons stated above.

In view of the foregoing amendments and remarks, entry of the amendments to Claims 1, 12, 18 and 20, reconsideration of Claims 1-23, and allowance of the application with Claims 1-23 are respectfully solicited.

Respectfully submitted,



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